



Mr. Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMO-NOP
1400 Independence Ave., S.W. Room 4008
Washington, DC 20250

August 15, 2005

RE: National Organic Program, Sunset Review, Docket number TM-05-02

Dear Mr. Neal;

CROPP Cooperative respectfully submits these comments to the AMS regarding the above referenced docket relating to the addition of DL-Methionine to the National List of Allowable Substances until October 21, 2008.

As co-author of the petition requesting this extension and on behalf of the 70 certified organic egg, broiler chicken and turkey producer/members of CROPP Cooperative I would like to go on record as supporting this proposed amendment.

Since DL-Methionine is currently scheduled to expire on October 21, 2005 I would like to thank you for your prompt attention to this issue by drafting and posting this proposed rule change in such a timely manner. Virtually all of our producers currently use DL-Methionine to balance their organic feed rations and would suffer substantial disruption to their businesses without this extension.

As the petition, the TAP and the public testimony clearly state, DL-Methionine is a synthetically produced Amino Acid which is identical to naturally occurring Methionine. It is the only amino acid which cannot at this time be naturally balanced in a 100% organic feed ration. Neither natural nor synthetic Methionine is a growth stimulant and so cannot be used for production beyond natural healthy growth. Inadequate levels of Methionine in the diet is deleterious to the health and welfare of the animals resulting in increased incidences of feather picking, cannibalism and compromised immune system development.

As stated in the Petition justification statement this extension will allow the organic community to conduct research and trials on alternative feedstuffs, breeds and production methods in order to eliminate the need for synthetic Methionine without significantly jeopardizing current production.

Sincerely,

A handwritten signature in cursive script that reads "Jim Pierce".

Jim Pierce
Certification Czar
Organic Valley/CROPP Cooperative.